

EXHIBIT 20

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

- - - - -
LEIGHTON TECHNOLOGIES, LLC,)

plaintiff,)

vs.)

Case No.

) 04 Civ. 02496 (CM)

OBERTHUR CARD SYSTEMS, S.A.)

and OBERTHUR CARD SYSTEMS)

OF AMERICA CORP.,)

defendants.)

- - - - -
(Volume III - pages 522 through 875)
- - - - -

Continued videotaped deposition of
KEITH LEIGHTON, a witness herein, called by the
defendants as if upon cross-examination, and
taken before David J. Collier, RPR, Notary
Public within and for the State of Ohio,
pursuant to Notice of Deposition and pursuant to
the further stipulations of counsel herein
contained, on Monday, the 23rd day of October,
2006 at 8:02 a.m., at the offices of Tackla &
Associates, 1020 Ohio Savings Plaza, City of
Cleveland, County of Cuyahoga and the State of
Ohio.

Tackla
& Associates

Court Reporting & Videotaping

1020 Ohio Savings Plaza
1801 E. Ninth Street
Cleveland, Ohio 44114

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1 sync soak time was achieved you would increase
2 the pressure, but not more than 180?

3 A Correct. Try to maintain that in normal
4 lamination.

5 Q Okay. And the pressure was increased at
6 the end of the heat soak time to somewhere
7 between 50 pounds and 180 pounds per square
8 inch?

9 A Correct. Don't -- you know, this is going
10 to be hard for me to try to remember what I'm
11 telling you here right now before -- in a jury
12 trial.

13 Q Well, we're going to --

14 A I mean, we're going -- we're pulling
15 figures out and approximate figures and
16 guessing. I'm doing a guessing game here.

17 Q I understand that you're doing --

18 A And to try to guess it again a year from
19 now, that's going to be very difficult.

20 Q Well, let me -- let me put it to you this
21 way. We're going to show this to you again a
22 year from now, if necessary.

23 A Okay.

24 Q If for some reason your memory changes or
25 you believe that this is incorrect, you'll

1 calls with Mr. Everett?

2 A I have not spoken to him on the phone.

3 Q Okay.

4 A One time meeting.

5 MR. DeFRANCO: All right. Thanks
6 very much. That's all I have.

7 MR. GUTKIN: Okay. I just have
8 a couple questions.

9 - - - - -

10 DIRECT EXAMINATION

11 BY MR. GUTKIN:

12 Q Mr. Leighton, do you recall -- I'm holding
13 up Defendant's Exhibit E. Do you recall
14 discussing that document this morning?

15 A Yes.

16 Q How comfortable are you that the pressures
17 that are listed on this document for the heating
18 cycle are accurate of what you did at Motorola?

19 A This was all speculation.

20 Q Are you very comfortable, very
21 uncomfortable?

22 A I could be uncomfortable with it, yes,
23 because I don't know any of the parameters of
24 that laminator.

25 Q Okay. Can you take a look at your 207

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1 A If they used the concept that I was trying
2 to come up with, yes.

3 Q Okay. A concept of at least a different
4 design or changes --

5 A Laminating at hotter temperatures.

6 Q Okay. Let's -- we're going to turn to the
7 lamination steps in a second, but again,
8 Motorola had a card that it made before you got
9 there which was not successful?

10 A That's correct.

11 Q And you helped them to develop a successful
12 card with a dime-sized electronic element?

13 A I don't know if it was successful or not
14 because I don't know whether I destroyed the
15 electronics.

16 Q Okay.

17 A It was successful in the smoothness of the
18 card.

19 Q Okay. So they couldn't make a smooth card
20 but you could, with a dime-sized electronic in
21 it?

22 A That's correct.

23 Q And by "smooth" what do you mean?

24 A That would be equal thickness over the
25 surface of the card.

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1 that card for Motorola; is that right?

2 A Yes.

3 Q And you made -- right? You added some
4 layers.

5 A Right.

6 Q You got rid of the recess.

7 A Right.

8 Q And you don't know the failure rate for
9 this card in terms of the chips?

10 A No. I didn't test it, all I was seeing was
11 I come up with a smooth body of a pre-lam that
12 we could work with --

13 Q Okay.

14 A -- and they were happy with.

15 Q It was smooth, right?

16 A Right.

17 Q But if the electronics didn't work, it
18 didn't matter how smooth it was, did it?

19 A In my thoughts, it didn't matter, didn't
20 matter to them because they scrapped the idea as
21 soon as they saw I had a process where I could
22 make a smooth card.

23 Q They scrapped what?

24 A Scrapped making the small dime size coils.

25 Q They gave up on that?

1 A They gave up on that and they said now
2 here's the real problem.

3 Q Okay. So they moved away --

4 A We want you to do a big one.

5 Q They moved away from that totally?

6 A Right.

7 Q And you didn't work on the dime-sized coil
8 anymore?

9 A That's correct.

10 Q But you did make a completed card, right?
11 You --

12 A Yes, I did.

13 Q You made a card --

14 A I was successful in making a completed
15 card.

16 Q Okay. That is you made a laminated card
17 with an electronic element that had all of the
18 completed layers, PVC, over-laminate layers --

19 A That's correct.

20 Q -- and all.

21 And it was sufficiently flat that dye
22 sublimation printing could be done on the card?

23 A Correct.

24 Q But you don't know whether or not the cards
25 worked?

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1 Q Okay.

2 A We tried to maintain that.

3 Q So you take the sheets out.

4 A You transfer, another set of books goes in
5 the hot side and the set of books that you have
6 on the hot side goes to the cold side.

7 Q Okay. Let's finish --

8 A And then you close the laminator again, you
9 have a new set on the hot side and you have a
10 set on the cold side, and you try to close at
11 the same time.

12 Q Got it. Okay.

13 Let's -- all right. Let's go back to
14 the -- let's finish with the hot side, okay?

15 You're up to temperature.

16 A Correct.

17 Q 330 degrees or so, you're ready to go, and
18 when -- for the dime-sized cards that you
19 laminated for Motorola, was the pressure applied
20 immediately when the platens were closed?

21 A As soon as the cassette of cards comes into
22 the hot side and they're in place, then you shut
23 the laminator --

24 Q Okay.

25 A -- activating the heat cycle. It has to be

1 shut to activate the heat. Once open, it's not
2 heating. When you close it, it's heating.

3 Q Okay. And how long would it take for the
4 pre-lams, in general terms, to feel the heat
5 once the platens closed? Was it immediate?

6 A You close the platens and then you have a
7 heat soak time so that you can equalize the heat
8 through the entire book.

9 Q How long would it take for the -- for the
10 inlays to feel any heat?

11 A Oh, 10 to 15 minutes.

12 Q Before they felt any heat or before they --

13 A No, before they equalized.

14 Q Okay.

15 A It's a heat soak, so you got the --

16 Q All right.

17 A -- top of the book --

18 Q Right.

19 A -- the same temperature as the bottom of
20 the book.

21 Q Okay. So --

22 A All the way through.

23 Q So they would feel heat pretty quickly and
24 it would take 15 minutes for it to equalize?

25 A Correct.

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1 most -- less resistance first, which would be
2 the large ram, it would flow in there before it
3 will fill up the cold side it's going to be
4 taking all the fluid on the hot side first. And
5 that was proven by the fact that the hot ram
6 closed first and it was a bigger ram. There was
7 a dwell time waiting for the cold ram to shut or
8 come up to pressure.

9 Q Okay. So are you saying that it was
10 physically impossible, given the size of the
11 rams and the way the hydraulic system worked, to
12 have the pressure on the cooling side be greater
13 than the pressure on the heating side in the
14 Burkle laminator at Motorola?

15 A I'm not one of physics, but in my own mind
16 it was much less, but it did manage to close and
17 cool down the product, but I'm not sure what the
18 surface pressure was on that cold side.

19 Q Okay. And whatever temperature you were
20 able -- I'm sorry. Whatever temperature and
21 pressure you were able to achieve on the cold
22 side of the Burkle laminator, the highest
23 success rate you got was 15 out of 24?

24 A I don't believe it had any relationship to
25 the cold side at all. I think they were

1 destroyed immediately as soon as they closed the
2 ram on the hot side.

3 Q Okay.

4 A That's my opinion. I don't -- I can't
5 prove that.

6 Q Okay. Well, let's explore that a little
7 bit.

8 You said that the best rate you got
9 was 15 out of 24, right? At some point before
10 that you got a lower success rate, right? It
11 got better over time as you worked.

12 A Yeah.

13 Q Did these tests, right?

14 A Um-hum. I improved the longer I worked
15 there.

16 Q Right. What in your mind led to the
17 increased or improved results over time? What
18 changes in the process did you make that helped
19 to increase the success rate?

20 A Increase of pressure and changing the
21 thickness of the pre-lams, of being able to go
22 in there with thicker plastic.

23 Q Okay. Why did the thicker plastic -- did
24 that help to make sure that the chip wouldn't
25 poke through and damage --

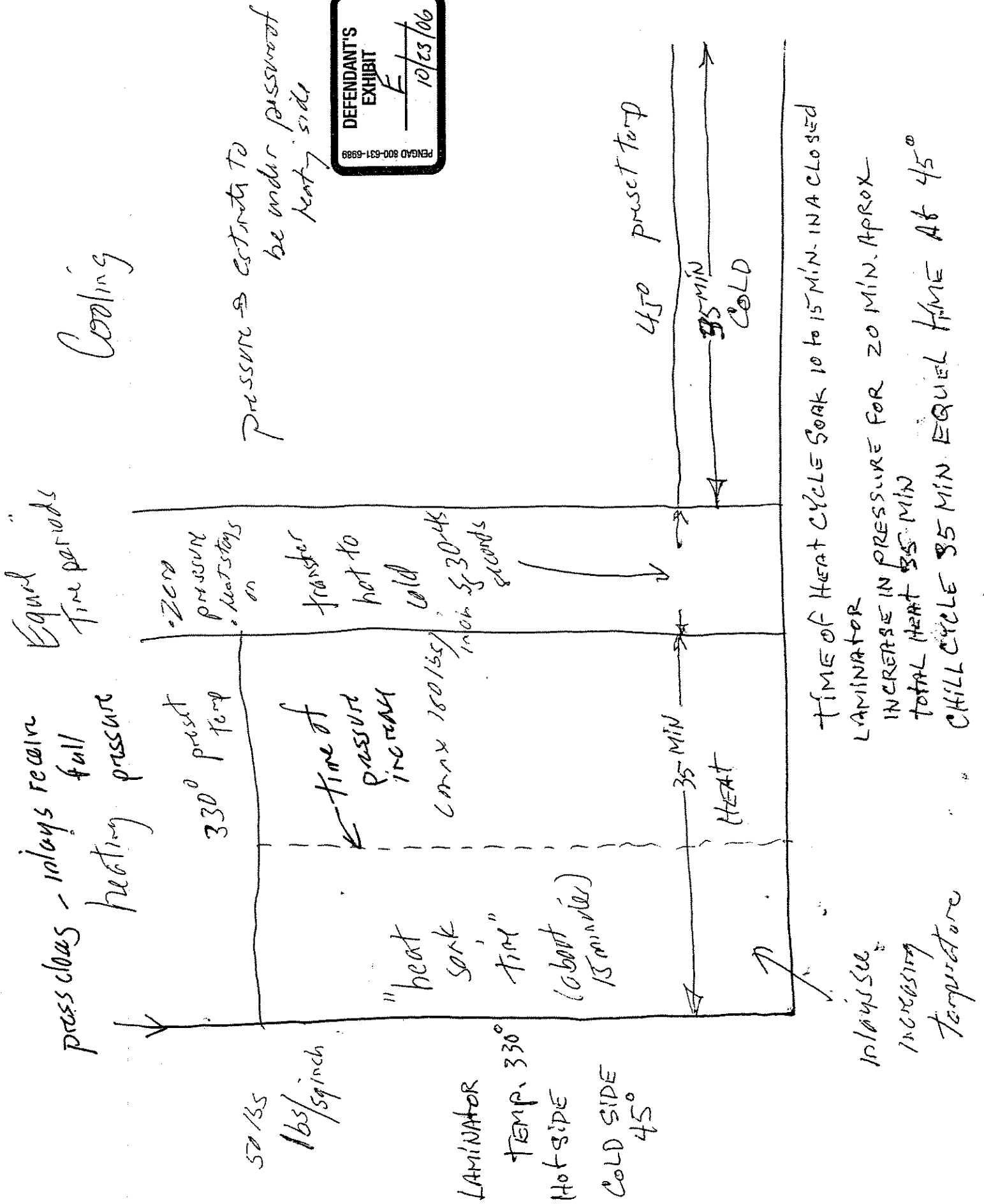


EXHIBIT 25

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FOR THE SOUTHERN DISTRICT OF NEW YORK

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1 remember that?

2 A Yes. I was wondering, can he read back
3 through where we left off at?

4 Q Let me -- let me just pick up.

5 A I have to get my chain of thought here.

6 Q Yeah, let me just pick up with it, okay?

7 A Okay.

8 Q We were talking about the heat soak time,
9 do you remember that, some period of time --

10 A Right.

11 Q -- that it takes?

12 A Right.

13 Q And you said 15 minutes or so.

14 A Right.

15 Q Okay. And then there is an additional time
16 once the temperature is equalized across all the
17 inlays of the heating cycle; is that right?

18 A Right. That's correct.

19 Q Okay. Do -- do the inlays -- in the
20 process you used at Motorola, would the inlays
21 see heat pretty immediately or would it take
22 some amount of time before they would feel any
23 heat?

24 A Well, to -- for the heat to go through the
25 book entirely from top and bottom, we had to

1 shut the laminator, and this is where the
2 pressure comes in uncontrolled, I'm not sure
3 just how much, and we stay in it for a period of
4 time to soften that plastic to be able to flow
5 the inlays into the plastic.

6 Q Let me -- let me break that down, okay?
7 Going back to what you said before, the press,
8 the laminators heated --

9 A Right.

10 Q -- right, before the --

11 A Prior to -- right.

12 Q Prior to inserting the -- what would you
13 call the inlay surrounded by the metal plates
14 that are inserted?

15 A That's a book.

16 Q Okay. Is the entire book inserted?

17 A Right.

18 Q And a book has however many inlays
19 surrounded by steel plates?

20 A That's correct.

21 Q And felt on the outside?

22 A Right.

23 Q Is that the book?

24 A Top and bottom. That would be the book.

25 Q Okay. And --

EXHIBIT 26

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1 Q All right. Well, then you move to the cold
2 phase, right?

3 A Correct.

4 Q Then the heat is shut off.

5 A The heat stays on the hot side, the cold
6 side remains cold, and the temperature is
7 dropped by closing the cold side, extracting the
8 heat out of the book.

9 Q Okay. And what pressure generally would
10 you apply when you were -- had the success rate
11 of 15 out of 24 for Motorola in the cards with
12 the electronic element, how did the pressure in
13 the cold phase compare to the pressure in the
14 heating phase?

15 A I don't know what the pressure was on the
16 cold side. All I can say is I would estimate it
17 to be under the pressure of the hot side.

18 Q And what do you base that on?

19 A The size of the ram.

20 Q Did anybody work with you at Motorola to
21 figure out or to apply the pressures that were
22 being used in the Burkle laminator? Did you
23 have a technician or operator that would --

24 A They had an operator, his name was Kiet.
25 I'm not sure of his nationality. I think it was

EXHIBIT 27

Confidential

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

LEIGHTON TECHNOLOGIES, LLC,)	Case No.
Plaintiff and)	04 Civ. 02496
Counterclaim Defendant,)	
v.)	
OBERTHUR CARD SYSTEMS, S.A., AND)	
OBERTHUR CARD SYSTEMS OF)	
AMERICA CORPORATION,)	
Defendants and)	
Counterclaim Plaintiffs)	

CONFIDENTIAL

DEPOSITION OF JEAN-MARC DELBECQ

WEDNESDAY, MARCH 22, 2006

PAGES 151 - 308; VOLUME 2

BY: CHRISTINE L. JORDAN, CSR NO. 12262

Confidential

Page 232

1 exhibit a three-page document bearing Bates Nos. L06585
2 through 6587.

3 THE REPORTER: This will be 2020.

4 (Defendants' Exhibit No. 2020 was marked for
5 identification.)

6 BY MR. J. JACOBS:

7 Q. Do you recognize this document, sir?

8 A. I do not recognize this document. I
9 recognize the sort of organization of the document.

10 Q. And what do you mean by that?

11 A. These are my notes.

12 Q. This is your handwriting?

13 A. Yes.

14 Q. But you don't recall handwriting it?

15 A. No.

16 Q. All right. Well, let's spend a little bit of
17 time with it, then, since you're the author. Maybe you
18 can help us understand what it means.

19 Have you had time to review it?

20 (The witness reviews the document.)

21 THE WITNESS: Hold on just a second.

22 (The witness reviews the document.)

23 THE WITNESS: Okay.

24 BY MR. J. JACOBS:

25 Q. Having reviewed it, does it refresh your

Confidential

Page 242

1 So here's a process. We also had clear media, and we
2 could see how all the stuff was behaving during
3 lamination.

4 And we were -- we -- we were going to try,
5 and in fact we did, I very specifically recall using
6 glue sticks as the adhesive to hold the coil and the IC
7 in place. I don't remember the brand of glue sticks,
8 but we did find some glue sticks were better than
9 others.

10 Q. You wrote -- is it -- is it fair to say
11 that -- well, do you recall testifying just a few
12 minutes ago that you wrote this down, this process
13 down, in lieu of Mr. Leighton?

14 A. I don't recall ever getting any documentation
15 from Keith Leighton.

16 Q. All right. What was the purpose of this
17 documentation?

18 A. The purpose of this documentation was to
19 document the process that Kiet was going to use while
20 Keith was gone.

21 Q. Did Kiet in fact use this process when
22 Leighton was gone?

23 A. I can't say that he did. I assume that he
24 did.

25 Q. All right. As a result of Kiet's using a

Kiet, Keith, J-m

4/9/95
 ⇒ Use Smaller Size for U-soft
 ⇒ Plates 1/2" Larger than Sheet all around

2 mil overlaminate ⇒ Most Over lams are Tin Based

- 1). J-m ⇒ Order 1000 sheets Sumitomo from Silcox (1.45 / lb 10 sheets / lb 1000 sheets) - 20
- 2). Keith has samples of coated and non-coated coming in 4/6
- 3). J-m ⇒ Order 1000 Sheets of whatever Other over lams Silcox has

7 mil printed 12.625 X 21.25

POT U-soft logo

- 1). J-m ⇒ Order 24-up u-soft art plus Louda marks, 200 Sheets
 * Reverse Print coil locations ←
- 2). Keith ⇒ Sent 200 Sheets to be printed @ caulastics

- 3). Kiet ⇒ Order 2200 7 mil Arlington Mills plastic, Tin Based

- 4). Don't worry about inks for now!

- 5). Kiet ⇒ Give PVC data sheets to J-m

20 mil 12.625 X 21.25

- 7). Kiet ⇒ Order 1000 sheets Arlington mills

Polishing Plates ⇒ 1/2" Larger than Sheet size

- 1). Keith ⇒ Order 280 mirror & 280 matte Plates. Stainless Steel

Press pads ⇒ 1/2" Larger than Sheets 1672

- 2). Keith ⇒ order 42 press pads

EXHIBIT 2020 PLT DEFT
 WITNESS DELBCCQ
 CONSISTING OF 3 PAGES
 DATE 3/22/2006
 BEHMKKE REPORTING & VIDEO SERVICES

Steel Trays (Plates) \Rightarrow $\frac{1}{2}$ " Larger than sheets

2). Kiet \Rightarrow order 42 plates from Rogers Source

CASSETTES \Rightarrow Takes 16 cassettes to keep operating
 \Rightarrow We have 4 cassettes in house
 \Rightarrow We have 2 " in process

1). Kiet \Rightarrow Take 2 cassettes to RMD tomorrow to enlarge. When back, will take next two.

2). Ken T. \Rightarrow Order more cassettes.

3). Keith / Kiet \Rightarrow Draw up a print of cassettes.

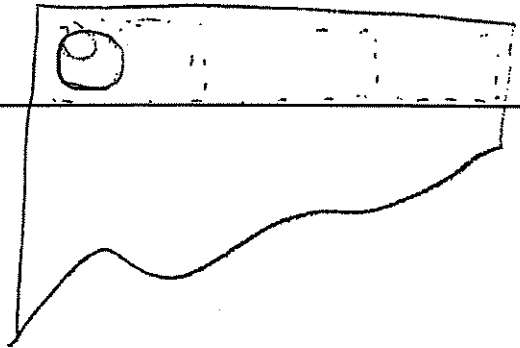
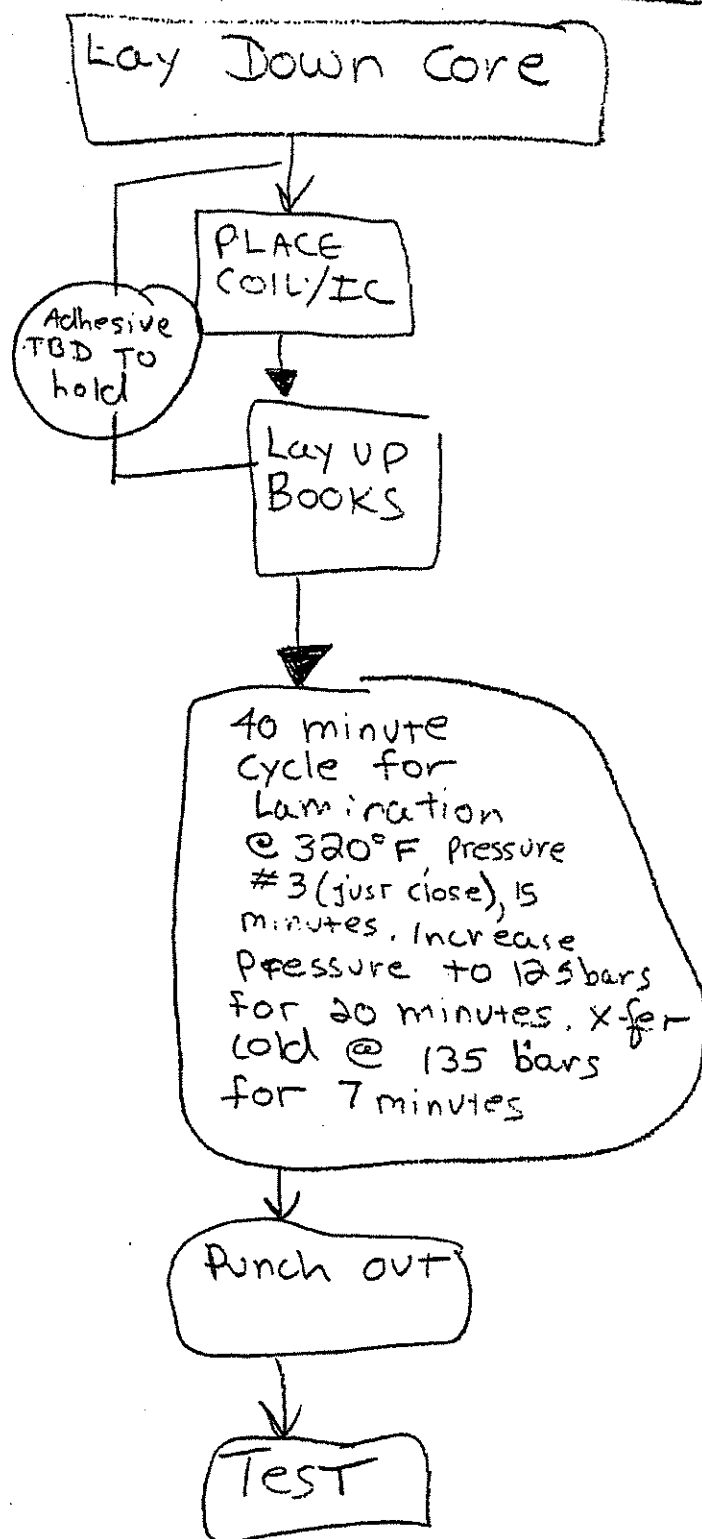
Documentation \Rightarrow Keith out next week!

1). Keith \Rightarrow Create process/Development Docs for Kiet to use next week.

Resources

1). J-m \Rightarrow Talk to Jorge about person?

Laminating Process



* make some clear cards

* Try Glue Stick

*

EXHIBIT 28

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

LEIGHTON TECHNOLOGIES, :
 :
Plaintiffs, :
 :
vs. : No. 04-CV-02496
 :
 :
OBERTHUR CARD SYSTEMS, S.A., :
OBERTHUR CARD SYSTEMS OF :
AMERICA CORPORATION, :
 :
Defendants. :

--oOo--

VIDEOTAPE DEPOSITION OF
KEN THOMPSON
VOLUME I

May 4, 2006

REPORTED BY: KENNETH T. BRILL, RPR, CSR 12797

ELLEN GRAUER COURT REPORTING CO. LLC
126 East 56th Street, Fifth Floor
New York, New York 10022
212-750-6434
REF: 80728

1 THOMPSON

2 Q. Thank you for noticing that.

3 A. So from -- from that information, I would
4 assume that Mr. Leighton had been working with us
5 for approximately one week, half a week, maybe.

6 Q. I direct your attention to Page 6586 where
7 it says Documentation.

8 A. Yes.

9 Q. It says, "Keith out next week."

10 A. Yes.

11 Q. Do you recall that Keith Leighton left for
12 a week shortly after arriving at Motorola --

13 A. Yes.

14 Q. -- Indala?

15 A. Yes. I think Keith Leighton may have left
16 one, two or three times. But he was going to be out
17 next week. And I do recall, this document was
18 produced mainly to -- to further the work and not
19 lose momentum when Mr. Leighton was out.

20 So this was documenting for Kiet and
21 others what -- what things would be done while
22 Mr. Leighton was -- was away.

23 Q. I ask you to look at the last page.

24 A. Yes.

25 Q. Did that -- do you recognize what's on

1 THOMPSON

2 that page? That's page Bates number L06587.

3 A. Yes.

4 Q. And what is that?

5 A. That's a description of a lamination
6 process for making laminated RFID cards.

7 Q. Did that description represent the process
8 as it was at Indala on approximately April 4, 1995?

9 A. I -- I don't recall. I do recall this is
10 a basic process flow as far as the details and
11 the -- it's not -- basically it represents a process
12 flow.

13 Q. I ask you to direct your attention to the
14 second page, Bates number L06586. Under the
15 statement, Keith out next week, point 1, quote,
16 Keith, arrow, great process/development docs for
17 Kiet to use next week?

18 A. Yes.

19 Q. Did Mr. Leighton create the process/
20 development docs for Kiet to use the next week?

21 A. I do not recall.

22 Q. The next -- underneath that, it says
23 resources. Jean-Marc, arrow, quote, talked to Jorge
24 about person, exclamation mark.

25 A. Mm-hmm.

1 THOMPSON

2 At about the time Mr. Leighton came to --

3 A. Yeah.

4 Q. -- Indala -- let me ask the question --
5 were you running the cold side of the B'rkle press
6 at full -- full pressure?

7 A. We were squeezing just about every ounce
8 of pressure we could out of the cold side, because
9 we knew that in very short fashion, we're actually
10 going to be increasing the ram size on the cold
11 side.

12 We know we needed the extra higher
13 pressure on the cold side to get a higher pressure
14 on cold than hot lamination, which is what we've
15 been told by industry people is somewhat of an
16 accepted thing we have to do. In fact, Mr. Leighton
17 also agreed with that, that we had to have higher
18 pressure, much higher pressure on the cold side as
19 well.

20 Q. All right.

21 A. I will say that in Exhibit 2,673, on the
22 third page, L06587, that this laminating process,
23 when I look at it, does not describe the process
24 that we were using. This describes to me either one
25 of -- one or two things. It describes a single step

1 THOMPSON

2 process for laminating and making a card, because
3 there is no core lamination, and then final
4 lamination. Or it refers to, hey, let's punch --
5 let's make a core and then punch it out and test
6 prior to going to the final lamination.

7 Q. Right.

8 A. So that's -- this seems to be maybe an
9 experiment variation that either Mr. Leighton wanted
10 to try, and Jean-Marc Delbecq captured it, or
11 Jean-Marc Delbecq, Kiet and Mr. Leighton said, hey,
12 let's try this. So it's certainly not a -- a viable
13 card -- finish card process.

14 Q. What you're talking about now is that this
15 is a one-step process -- strike that.

16 Are you now talking about this being a one
17 stop process versus the two -- the two lamination
18 process that you drew before for us on exhibit -- I
19 don't have the exhibit in front of me. Can you help
20 us with that, help me with that?

21 A. 2,664. Yes, it appears to be either a
22 one-step process for -- for making a card, or
23 describing making a core lamination sheet, which is
24 then punched out and electrically tested.

25 Q. Do you have any reason to believe that the

1 THOMPSON

2 cycle parameters set forth are not those that were
3 being used to make a core?

4 A. No. They were not. It doesn't -- it
5 doesn't look to be, from my knowledge, of what has
6 worked in their lamination with this machine. Those
7 are not parameters that would -- that would work, or
8 would be -- have shown to work.

9 I believe that this was someone's -- an
10 experimentation cycle. Someone says, I think
11 something like this will work, let's try this.
12 Okay. Let's document what it is. And it could be a
13 documentation of what Kiet was supposed to the week
14 when Mr. Leighton was out.

15 Q. What about the cycle here do you think
16 makes it inoperative?

17 A. The cycle or parameters in lamination?

18 Q. Yeah, the lamination parameters, the cycle
19 parameters.

20 A. The pressure on the cold side is too low,
21 so it's only ten bars higher than the hot side,
22 that's too low. The temperature is 320 F, which is
23 approximately 145 C, 150 C, I think that's too hot.
24 Pressure number three, just close, I don't
25 understand that.

EXHIBIT 29

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

LEIGHTON TECHNOLOGIES, LLC,)

plaintiff,)

vs.)

Case No.)

04 Civ. 02496 (CM)

OBERTHUR CARD SYSTEMS, S.A.)

and OBERTHUR CARD SYSTEMS)

OF AMERICA CORP.,)

defendants.)

(Volume III - pages 522 through 875)

Continued videotaped deposition of
KEITH LEIGHTON, a witness herein, called by the
defendants as if upon cross-examination, and
taken before David J. Collier, RPR, Notary
Public within and for the State of Ohio,
pursuant to Notice of Deposition and pursuant to
the further stipulations of counsel herein
contained, on Monday, the 23rd day of October,
2006 at 8:02 a.m., at the offices of Tackla &
Associates, 1020 Ohio Savings Plaza, City of
Cleveland, County of Cuyahoga and the State of
Ohio.

Tackla
& Associates

Court Reporting & Videotaping

1020 Ohio Savings Plaza
1801 E. Ninth Street
Cleveland, Ohio 44114
216-241-3918 • Fax 216-241-3935

1 still in this full sheet.

2 Q Okay. And the x-ray was for --

3 A Test purposes only. We would x-ray a bad
4 card just to see what happened to that card.

5 Q I got you. Okay.

6 A After they cut discontinuous from the
7 sheet.

8 Q Okay. Now, for the cards that you made at
9 Motorola when you heated the core sheets on
10 which one of the sheets had the electronic
11 element glued; do you remember that?

12 A Yes. Um-hum.

13 Q The heating allowed the material, the
14 plastic, to flow and encapsulate the electronic
15 element?

16 A Correct.

17 Q And because the material or plastic flowed,
18 the electronic element wouldn't be damaged or
19 broken or crushed during the lamination process
20 when pressure was applied; is that right?

21 A That was a problem they had, because when
22 it went into the laminator, even though the
23 laminator is hot, the sheets are cold, and the
24 book is cold, it takes a period of time, up to
25 15 minutes, to get that full book heated to the

1 point where the plastic is soft.

2 Q So how did you overcome that at Motorola?

3 A I didn't. That's why we had a large
4 failure rate.

5 Q Okay. So you had a failure rate of 15 out
6 of 24, which was unacceptable.

7 A That's correct.

8 Q All right. So you weren't able to fully
9 solve that problem when you were at Motorola.

10 A That's correct.

11 Q You had some success. 15 out of 24 is some
12 rate of success.

13 A Yeah, I had some workable cards that they
14 were happy with at the time.

15 Q Okay.

16 A It wasn't a process that would be
17 profitable.

18 Q Okay. Any other testing, analysis you did
19 of the results that you got, the cards that you
20 made at Motorola to improve the process? Do you
21 understand the question? We talked about --

22 A No.

23 Q -- you got 15 out of 24.

24 A Right.

25 Q Were there any other tests that you did?

EXHIBIT 30

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LEIGHTON TECHNOLOGIES, LLC,) Case No.
)
Plaintiff and) 04 Civ. 02496
)
Counterclaim Defendant,)
)
v.)
)
OBERTHUR CARD SYSTEMS, S.A., AND)
)
OBERTHUR CARD SYSTEMS OF)
)
AMERICA CORPORATION,)
)
Defendants and)
)
Counterclaim Plaintiffs)

DEPOSITION OF JEAN-MARC DELBECQ
WEDNESDAY, MARCH 22, 2006
PAGES 151 - 308; VOLUME 2

BY: CHRISTINE L. JORDAN, CSR NO. 12262

Confidential

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1 financial interest in the results in this suit?

2 A. Do I have any financial interest, no.

3 Q. You have no financial interest as to whether
4 the patents are held valid or invalid?

5 A. No.

6 Q. Are you making any claim to be an inventor of
7 the inventions that are claimed in the patents in suit?

8 A. I am not making any claim to be the inventor.

9 MR. J. JACOBS: Let me just check and make
10 sure there's nothing else.

11 (Mr. Jacobs reviewing file.)

12 BY MR. J. JACOBS:

13 Q. When Mr. Leighton arrived at -- strike that.
14 Did you explain to Mr. Leighton while he was
15 at Indala the processes you had developed?

16 A. I -- I did, yes.

17 I -- I might have described in my last
18 deposition my first engagement with Mr. Leighton which
19 included going to our lab and seeing what we were
20 doing, meeting with Kiet and Toni. And there was
21 the -- there was something that we put up on the white
22 board which -- which was based on a discussion between
23 what we -- a discussion of what we wanted Keith
24 Leighton to do for us. Yeah.

25 Q. You explained to him the structure of the